

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

_____)	
CATALINA DAVIS)	
Plaintiff)	
)	
v.)	CASE NUMBER 05-30112-MAP
)	
)	
CARABETTA)	
Defendant)	
_____)	

JOINT STATEMENT Pursuant to Local Rule 16

Nature of case

This is an action alleging retaliatory discrimination in the work place in violation of Title VII of the Civil Rights Act of 1964.

Procedural history

On August 27, 2002 Plaintiff filed a complaint before the Massachusetts Commission Against Discrimination (M.C.A.D.) alleging that "Carabetta" discriminated against her for opposing sexual harassment in violation of Massachusetts General Laws ch. 151B sec. 4. The complaint was amended February 23, 2003 to included an allegation of retaliation in violation of Title VII of the Civil Rights Act of 1964.

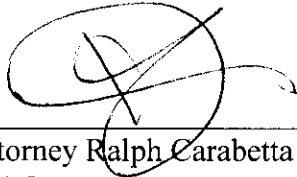
The matter remained before the M.C.A.D. through the close of discovery. At the Certification to Public Hearing conference Plaintiff withdrew her complaint to place this matter before the United States District Court. The matter before the M.C.A.D. was dismissed with prejudice.

Proposed Discovery and Motion Schedule

1. Amendments to pleadings filed no later than November 10, 2005.
2. Discovery pursuant to Fed. R. Civ. P. 33, 34, and 35 to be completed by January 2, 2006.
3. Discovery pursuant to Fed. R. Civ. P. 30 and 36 to be completed by February 10, 2006.

4. Motions pursuant to Fed. R. Civ. P. 12 and 56 to be filed by February 17, 2006.

Dated: 10/27/05

A handwritten signature in black ink, appearing to be 'Ralph Carabetta', written over a horizontal line.

Attorney Ralph Carabetta
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Dated:

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